

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SECOND AMENDMENT FOUNDATION, INC., §
RAINIER ARMS, LLC, SAMUEL WALLEY, and §
WILLIAM GREEN, §

Plaintiffs, §

v. §

BUREAU OF ALCOHOL, TOBACCO, FIREARMS §
AND EXPLOSIVES, REGINA LOMBARDO, in her §
official capacity as Acting Director of the Bureau of §
Alcohol, Tobacco, Firearms, and Explosives, UNITED §
STATES DEPARTMENT OF JUSTICE, and §
JEFFREY ROSEN, in his official capacity as Acting §
ATTORNEY GENERAL, U.S. Department of Justice, §

Defendants. §
§
§

Case No. 3:21-cv-00116-B

UNOPPOSED MOTION TO WITHDRAW CERTAIN COUNSEL

Plaintiffs Second Amendment Foundation, Inc., Rainier Arms, LLC, Samuel Walley, and William Green (“Plaintiffs”) file this Unopposed Motion to Withdraw Certain Counsel and, in support thereof, would respectfully show as follows:

Attorney Daniel N. Nightingale now asks permission to withdraw as counsel for Plaintiff. Good cause exists for such withdrawal because, effective January 24, 2022, Mr. Nightingale will no longer work for Beck Redden LLP, the law firm serving as counsel for Plaintiffs in this case. Chad Flores and Hannah Roblyer of Beck Redden LLP will continue to represent Plaintiffs in this matter. Defendants are unopposed.

Mr. Nightingale’s withdrawal as counsel of record for Plaintiffs will cause no prejudice to any party herein and will neither delay nor interfere with the disposition of this case.

WHEREFORE, Daniel N. Nightingale moves to withdraw as counsel of record for Plaintiffs.

DATED: January 20, 2022.

Respectfully submitted,

BECK REDDEN LLP

By /s/ Daniel N. Nightingale

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** Admitted pro hac vice*

Certificate of Conference

I hereby certify that I have advised counsel of record for all parties of the filing of this Motion to Withdraw, and none are opposed.

/s/ Daniel N. Nightingale
Daniel N. Nightingale

Certificate of Service

I hereby certify that on January 20, 2022, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Daniel N. Nightingale
Daniel N. Nightingale